

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

JOHN BARNHARDT, et al.,)	
)	
Plaintiffs,)	
)	
and)	
)	
UNITED STATES OF AMERICA,)	Civil Action No. 4:65-cv-01300-HTW-LRA
)	1300(E)
Plaintiff-Intervenor,)	
)	
v.)	
)	
MERIDIAN MUNICIPAL SEPARATE)	
SCHOOL DISTRICT, et al.,)	
)	
Defendants.)	
)	

**UNITED STATES' MOTION FOR EXTENSION OF TIME TO RESPOND TO
DEFENDANT'S MOTION FOR UNITARY STATUS**

Pursuant to Fed. R. Civ. P. 6(b) and L.R. 7(b)(4), Plaintiff United States of America (“United States”) hereby files this motion for an extension of the deadline in which to respond to the Defendant Meridian Public School District’s (“District”) Motion for Unitary Status (ECF No. 53). This request is made in good faith and with good cause, as set forth below.

1. The District filed a Motion for Unitary Status on March 29, 2018.
2. Pursuant to Local Rule 7(b)(4), the United States’ response to the Motion for Unitary Status is otherwise due on April 13, 2018.
3. On Friday, April 6, 2018, Private Plaintiffs filed a request for a scheduling conference and a stay of briefing on the District’s motion until after the parties complete discovery and the Court holds an evidentiary hearing (ECF No. 55). The United States does not object to Private Plaintiffs’ motion, but the District has expressed an

objection to any extensions of time to respond to its Motion for Unitary Status. Discovery, if permitted by the Court, would be relevant to any arguments about the District's compliance with existing Court Orders in this case. Therefore, resolving this scheduling dispute at a conference, before the parties are required to file a response to the District's motion, would conserve the resources of the Court as well as the parties. The United States agrees with the Private Plaintiffs that a discovery and briefing schedule should be set by the Court, and would comply with deadlines the Court sets therein.

4. In accordance with Local Rule 7(b)(10), the United States has conferred with the District and with Private Plaintiffs, and joins in a request for a scheduling conference before any response to the District's motion must be filed.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on April 10, 2018, I electronically filed the foregoing with the Clerk of the Court using the ECF system, which sent notification of such filing to all counsel record.

/s/ Natane Singleton